

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

MUNUSAMY KANDASAMY	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	<b>Case No. 1:18-cv-00029 (AJT-TCB)</b>
	)	
ADVANCED SOFTWARE	)	
SYSTEMS, INC.,	)	
	)	
Defendant.	)	

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**ASSYST’S MOTION TO COMPEL DISCOVERY**

Pursuant to Federal Rules of Civil Procedure 37 and 45 and Local Rule 37, Defendant, Advanced Software Systems, Inc. (“**Assyst**”), respectfully moves this Court to compel discovery against Charlson Bredehoft Cohen & Brown, P.C. (“**Charlson Bredehoft**”) to require prompt production of all responsive documents to Assyst’s subpoena for documents (the “**Subpoena**”) served upon Charlson Bredehoft in this matter. A corresponding memorandum, notice of hearing, and proposed order are being submitted with this motion.

Counsel hereby certifies that a good faith effort has been made to resolve the discovery matters at issue without court action.

Assyst requests that this Court order (1) Charlson Bredehoft to produce to Assyst all documents responsive to Requests 6 and 10 of the Subpoena, including all documents listed on Charlson Bredehoft’s submitted privilege log and unredacted versions of its documents already produced to Assyst, and that Charlson Bredehoft’s objections to Requests 6 and 10 be stricken; (2) Charlson Bredehoft to make such production no later than January 11, 2019; and (3) all other relief for Assyst deemed just and proper by this Court.

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 4, 2019, I filed the foregoing document with the Clerk of Court using the Court's CM/ECF system, which will then send notification of this filing to the following filing users:

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I also sent the foregoing by electronic mail on January 4, 2019, to:

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\_\_\_\_\_/s/  
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